

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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JUN 30 2005

PUBLIC SERVICE  
COMMISSION

IN THE MATTER OF:

JOINT APPLICATION OF LOUISVILLE GAS AND )  
ELECTRIC COMPANY AND KENTUCKY UTILITIES )  
COMPANY FOR THE CONSTRUCTION OF )  
TRANSMISSION FACILITIES IN JEFFERSON, BULLITT, ) CASE NO. 2005-00142  
MEADE, AND HARDIN COUNTIES, KENTUCKY )

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DATA REQUESTS OF LOUISVILLE GAS AND ELECTRIC  
COMPANY AND KENTUCKY UTILITIES COMPANY  
TO INTERVENORS CATHY L. AND DENNIS L. CUNNINGHAM

Louisville Gas and Electric Company and Kentucky Utilities Company ("the Companies") respectfully submit the following data requests to Intervenors, Cathy L. and Dennis L. Cunningham ("Cunningham"), to be answered by the date specified in the Commission's Order of Procedure herein.

Instructions

1. As used herein, "Documents" include all correspondence, memoranda, notes, maps, drawing, surveys or other written recorded materials, whether external or internal, of every kind or description, in the possession of or accessible to Cunningham, its witnesses or its counsel. And, as used herein, "you" shall refer to Cathy L. and Dennis L. Cunningham, or either one of them, and their counsel.
2. Please identify by name, title, position and responsibility the person or persons answering each of these data requests for information.
3. These requests shall be deemed continuing so as to require further and supplemental responses if Cunningham receives or generates additional information within the

scope of these requests between the time of the response and the time of any hearing conducted herein.

4. To the extent that the specific document, work paper or information as requested does not exist, but a similar document, work paper or information does exist, provide the similar document, work paper or information.

5. To the extent that any request may be answered by way of a computer printout, spreadsheet or other form of electronic media, please identify each variable contained in the document or file which would not be self evident to a person not familiar with the document or file.

6. If Cunningham has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify the undersigned counsel for the Companies as soon as possible.

7. For any document withheld on the ground of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown or explained; and the nature and legal basis for the privilege asserted.

8. In the event any document requested has been destroyed or transferred beyond the control of Cunningham, or any of their witnesses, state: the identify of the person by whom it was destroyed or transferred and the person authorizing the destruction or transfer; the time, place and method of destruction or transfer; and the reason(s) for its destruction or transfer. If destroyed or transferred by reason of a document retention policy, describe in detail the document retention policy.

9. If a document responsive to a request is a matter of public record, please produce a copy of the document rather than refer the Companies to the record where the document is located.

**Data Requests**

1. Have you performed, requested or commissioned any review, study or analysis regarding the transmission project which is the subject of this proceeding (including, but not limited to, the need, location/route or impact of said project)? If so, produce copies of each such review, study or analysis, and any documents relating thereto, and state the name and address of the person(s), group or entity which performed each such study or analysis.

2. Have you retained any consultant or expert to testify in this proceeding? If so, state the name and address of such consultant or expert, produce a copy of his or her current curriculum vitae, and summarize his or her expected testimony.

3. Produce copies of all documents, if any, you expect or intend to offer into evidence during the public hearing of this proceeding.

Dated: June 30, 2005

Respectfully submitted,



Kendrick R. Riggs

J. Gregory Cornett

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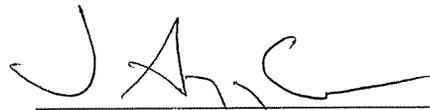
*Counsel for LG&E and  
Kentucky Utilities Company*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Data Requests For Information was served upon the following parties by regular mail, postage prepaid, on this 30th day of June, 2005.

Cathy L. Cunningham  
CDH Preserve LLC  
2530 N Hwy 11 SE  
Elizabeth, IN 47117

Dennis L. Cunningham  
Manager  
2530 N Hwy 11 SE  
Elizabethtown, IN 47117.



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J. Gregory Cornett  
Counsel for LG&E and  
Kentucky Utilities Company